



**Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-040005

FACILITY ID No.: 027-00026

AQCR: 64

CLASS: B

SIC: 2653

ZONE: 11

UTM COORDINATE (km): 536.4, 4827.7

1. PERMITTEE

Boise Packaging & Newsprint LLC

2. PROJECT

Change in Name/Ownership, Modification of Permit Requirements

3. MAILING ADDRESS

1808 E. Chisholm Dr.

CITY

Nampa

STATE

ID

ZIP

83687

4. FACILITY CONTACT

Karen Puryear

TITLE

Environmental Manager

TELEPHONE

(208) 384-7300

5. RESPONSIBLE OFFICIAL

Louis Miller

TITLE

General Manager

TELEPHONE

(208) 384-7300

6. EXACT PLANT LOCATION

Northeast Corner of Intersection of I-84 and Franklin Road (Exit 36)

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Corrugated container facility

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit is not transferable to another person, place, or piece of equipment.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

DATE ISSUED: Proposed

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE EXPIRES: XXXXXX

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Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-040005				
Permittee:	Boise Packaging & Newsprint L.L.C.	Facility ID No. 027-00026	Date Issued:	Proposed
Location:	Nampa, Idaho		Date Expires:	XXX

1. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This Tier II operating permit and PTC consolidates all of the facility's applicable requirements into a single permit. This permit establishes the facility as a natural minor facility.
- 1.2 This Tier II operating permit and PTC replaces the following permits, the terms and conditions of which shall no longer apply:
 - Permit to Construct No. 027-00026, issued November 14, 2002
 - Permit to Construct No. 027-00026, issued September 10, 2002
 - Permit to Construct No. 027-00026, issued July 17, 2001
 - Permit to Construct No. 027-00026, issued July 21, 2000
 - Permit to Construct No. 027-00026, issued June 2, 2000
 - Permit to Construct No. 027-00026, amended and issued May 5, 1995
 - Permit to Construct No. 027-00026, issued March 16, 1995

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Corrugators	None
4	Printing & Gluing	None
3	Starch Storage Silo	Baghouse
3	Scrap Cyclone	Cyclone & Baghouse

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

Performance Testing

- 2.11 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

Monitoring and Recordkeeping

- 2.12 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.13 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
June Ramsdell, Air Quality Manager
Boise Regional Office
1445 N. Orchard
Boise Idaho 83706
Phone: (208) 373-0550
Fax: (208) 373-0287

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Obligation to Comply

- 2.14 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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3. CORRUGATOR

3.1 Process Description

The corrugator manufactures corrugated sheet material using single facers, a double-back glue unit, pre-heaters, and starch. Starch is stored on-site in the starch storage silo and is received by a pneumatic conveying system from either rail cars or trucks. The starch is transferred to the process building via an enclosed screw auger, or manually, when necessary. Scrap generated by corrugated stock production is collected by a pneumatic system with a cyclone and a baghouse.

3.2 Emission Control Description

Emissions from the starch storage silo are controlled by a baghouse. Emissions from the scrap container board cyclone are controlled by a baghouse. Emissions from the corrugator are uncontrolled

Table 3.1 STARCH STORAGE SILO DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Starch Storage Silo	Baghouse	Baghouse Stack
Scrap Container Board Cyclone	Cyclone and Baghouse	Baghouse Stack

Emissions Limits

- 3.3 The VOC and PM₁₀ emissions from the corrugator shall not exceed any corresponding emissions rate limits listed in Table 3.2.

[PTC Condition]

**Table 3.2 STARCH STORAGE SILO BAGHOUSE
EMISSIONS LIMITS**

Source Description	VOC	PM ₁₀	
	T/yr	lb/day	T/yr
Corrugator	5.84	1.8	0.33
Starch Silo Baghouse	N/A	1.85	0.34
Scrap System Baghouse	N/A	2.56	0.22

- 3.4 The permittee shall comply with the visible emission requirements of Permit Condition 2.7.

Operating Requirements

- 3.5 The permittee shall maintain the pressure drop across the starch silo baghouse within manufacturer's specifications during periods of silo filling.

[PTC Condition]

- 3.6 The permittee shall maintain the pressure drop across the scrap system baghouse within manufacturer's specifications when the facility is in operation.

[PTC Condition]

- 3.7 The throughput of the container sheets of the corrugator shall not exceed 9.2 million square feet per day and 1.6 billion square feet per any consecutive 12-month period.

[PTC Condition]

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Monitoring and Recordkeeping Requirements

- 3.8 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the starch silo baghouse when it is operating, and continuously measure the pressure differential across the scrap system baghouse, to demonstrate compliance with Permit Condition 3.3.
[PTC Condition]
- 3.9 The permittee shall record the pressure drop across the starch silo baghouse once during each silo filling to demonstrate compliance with Permit Conditions 3.3 and 3.5.
[PTC Condition]
- 3.10 The permittee shall record the pressure drop across the scrap system baghouse once per day, when the system is in operation, to demonstrate compliance with Permit Conditions 3.3 and 3.6.
[PTC Condition]
- 3.11 The permittee shall monitor and record the throughput of corrugated sheets produced daily and annually to demonstrate compliance with Permit Condition 3.7.
[PTC Condition]
- 3.12 The permittee shall monitor and record visible emissions in accordance with Permit Condition 2.8.
- 3.13 Records shall be maintained in accordance with Permit Condition 2.12.

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4. PRINTING AND GLUING

4.1 Process Description

The printing and gluing process uses flexographic printers, laminators, and a die cutter to print designs and letters on the container board, cut and form the container, and glue the container to customer specifications. Glue and ink may also be applied by hand.

4.2 Emission Control Description

The facility-wide emissions from the printing and gluing operations are uncontrolled.

[PTC Condition]

Emissions Limits

- 4.3 VOC emissions from printing and gluing shall not exceed any corresponding emissions rate limits listed in Table 4.2.

[PTC Condition]

Table 4.1 PRINT AND GLUING EMISSIONS LIMITS

Source Description	VOC
	T/yr
Printing and Gluing	19

Operating Requirements

4.4 Ink and Ink Additives and Glue Usage Throughput Limits

- Ink and ink additives usage shall not exceed 380,000 pounds per year, based on purchasing records.
- Glue usage shall not exceed 1,500,000 pounds per year, based on purchasing records.

[PTC Condition]

4.5 Ink and Ink Additives and Glue VOC Content Limits

- The VOC content of ink and ink additives purchased during any consecutive 12-month period shall not exceed 8.0% by weight.
- The VOC content of glues purchased during any consecutive 12-month period shall not exceed 0.5% by weight.

[PTC Condition]

Monitoring and Recordkeeping Requirements

- 4.6 The permittee shall monitor and record ink and ink additives usage in pounds each month. Annually, by February 1, the permittee shall calculate the total annual usage of ink and ink additives for the period from January 1 to December 31 to demonstrate compliance with Permit Condition 4.4.

[PTC Condition]

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- 4.7 The permittee shall monitor and record the VOC content of each ink and ink additive, expressed as percent by weight, each month. Monthly, the permittee shall calculate a weighted 12-month rolling average VOC content for total ink and ink additive usage to demonstrate compliance with Permit Condition 4.5.

[PTC Condition]

- 4.8 The permittee shall monitor and record glue usage in pounds each month. Annually, by February 1, the permittee shall calculate the total annual usage of glue for the period from January 1 to December 31 to demonstrate compliance with Permit Condition 4.4.

[PTC Condition]

- 4.9 The permittee shall monitor and record the VOC content of glue, expressed as percent by weight, each month. Monthly, the permittee shall calculate a weighted 12-month rolling average VOC content for total glue usage to demonstrate compliance with Permit Condition 4.5.

[PTC Condition]

- 4.10 Records shall be maintained in accordance with Permit Condition 2.12

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5. SUMMARY OF EMISSION RATE LIMITS

Table 5.1 provides a summary of all emission rate limits required by this permit.

Table 5.1 SUMMARY OF EMISSION RATE LIMITS

Source Description	PM ₁₀		VOC
	lb/day	T/yr	T/yr
Corrugator	1.8	0.33	5.84
Starch Silo Baghouse	1.85	0.34	N/A
Scrap System Baghouse	2.56	0.22	N/A
Printing and Gluing	N/A	N/A	19

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6. TIER II PERMIT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. In the event of any change in control or ownership of source(s) covered by this permit, the permittee and succeeding owner or controller shall notify the Director of the change in ownership. Any proposed change(s) or modification(s) to this permit by the succeeding owner or controller shall be requested in accordance with the Rules for the Control of Air Pollution in Idaho.
6. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the the Director's request shall cause the permit to become void.
7. The Director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
8. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
9. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:

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- Initiation of Construction - Date
- Completion/Cessation of Construction - Date
- Actual Production Startup - Date
- Initial Date of Achieving Maximum Production Rate - Production Rate and Date

10. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.